

February 26, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street S.W.
Room TW-B204
Washington, D.C. 20554

Re: Special Access Data Collection – Public Response of Integra Telecom
Holdings, Inc.
FRN: 0004-2570-10
WC Docket No. 05-25

Dear Ms. Dortch:

Attached for filing are the redacted essay responses of Integra Telecom Holdings, Inc., pursuant to the Data Collection Protective Order, in the above proceedings. Highly Confidential and Confidential responses are being submitted via the Special Access Web Portal.

Sincerely,

/s/ Kim K. Wagner
Kim K. Wagner
Legal & Regulatory Administrator
Integra
763-745-8468 (direct)
763-745-8459 (department fax)
Kim.Wagner@integratelecom.com

CERTIFICATION

I have examined the response and certify that, to the best of my knowledge, all statements of fact, data, and information contained therein are true and correct.

Signature:

A handwritten signature in blue ink, appearing to read 'Douglas Denney', written over a horizontal line.

Printed Name: Douglas Denney

Title: Vice President, Costs & Policy

Date: February 24, 2015

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Question II.A.5: Map
Special Access Data Request
Integra Telecom Holdings Inc. FRN: 004-2570-10

Section II.A.5: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

[Redacted]

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II.A.8: Business Rules for Deployment

Explain your business rule(s) used to determine whether to build a *Connection* to a particular *Location*. Provide underlying assumptions.

a. Describe the business rules and other factors that determine where you build your *Connections*. Examples of such rules/factors are minimum *Term Commitments* or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a *Connection* to an otherwise suitable *Location*. These could be factors that are under your control or those that are not.

Response: **[Begin Confidential]**

[End Confidential]

[Begin Highly Confidential]

[End Highly Confidential]

[Begin Confidential]

[End Confidential].

b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

Response: **[Begin Confidential]**

[End Confidential]

c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy *Connections*, and where you generally have experienced or currently experience serious difficulties in deploying *Connections*, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response:

[Begin Confidential]

[End Confidential]

c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy *Connections*, and where you generally have experienced or currently experience serious difficulties in deploying *Connections*, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

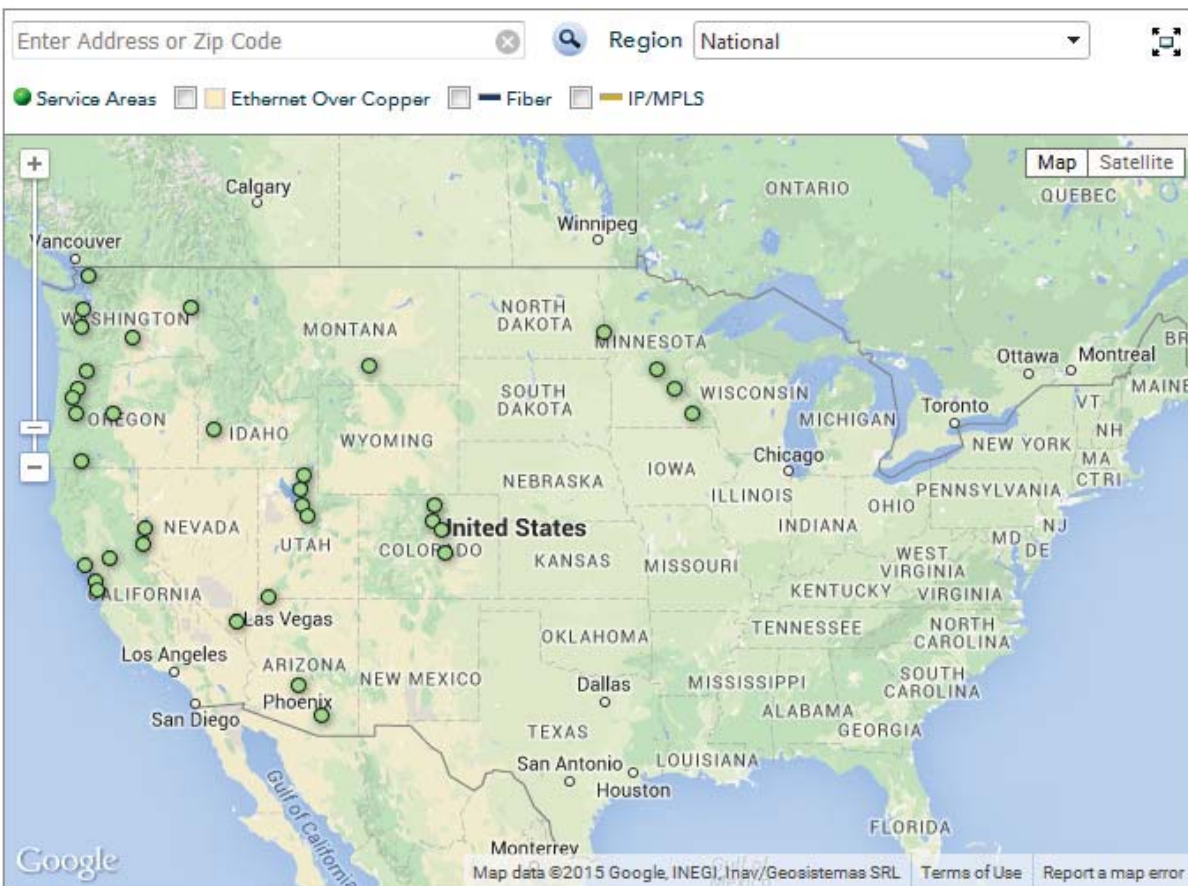
Response:

[Begin Confidential]

[End Confidential]

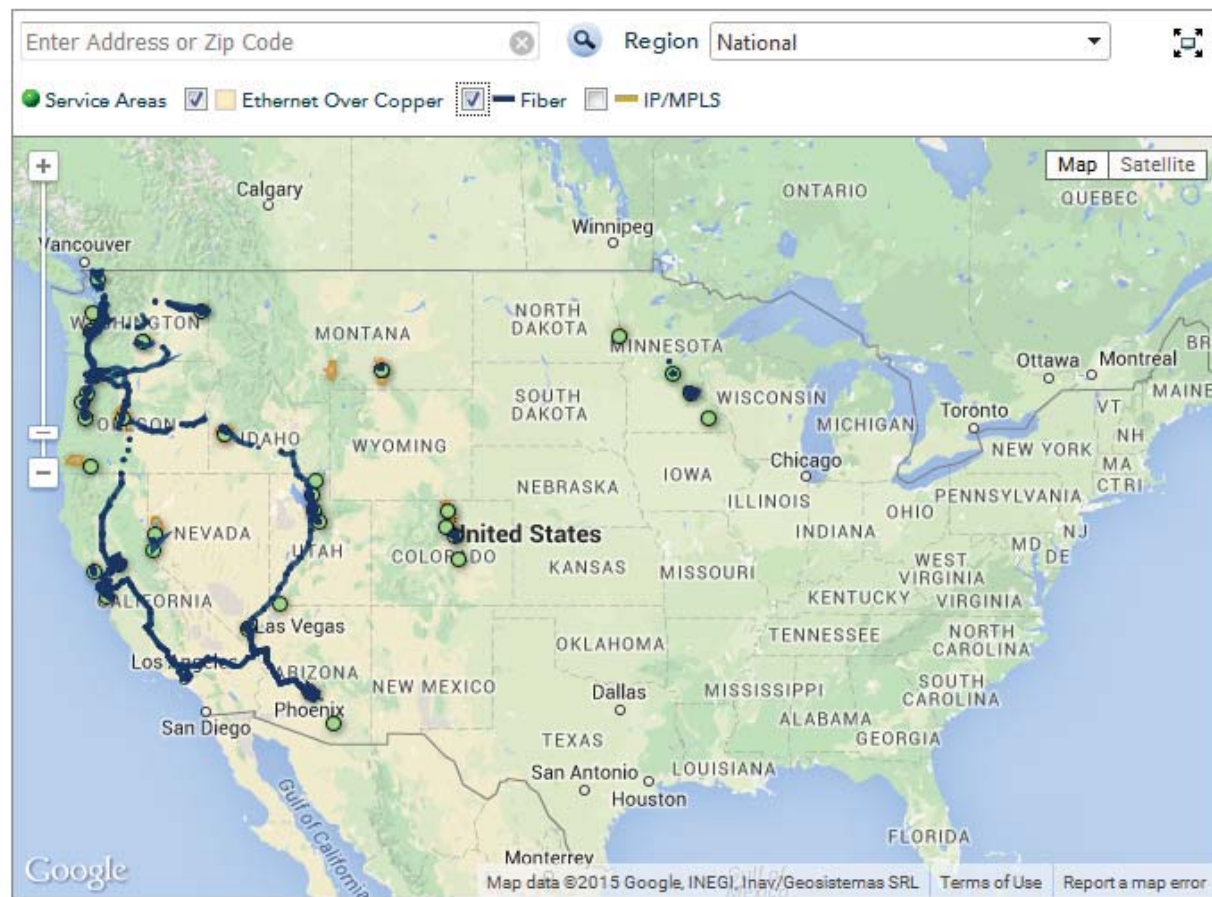
INTEGRA NETWORK MAP

Our Interactive Network Map enables you to view service areas and our robust fiber network. You can search the map by region or enter your address to find out where our reliable network can empower your business.



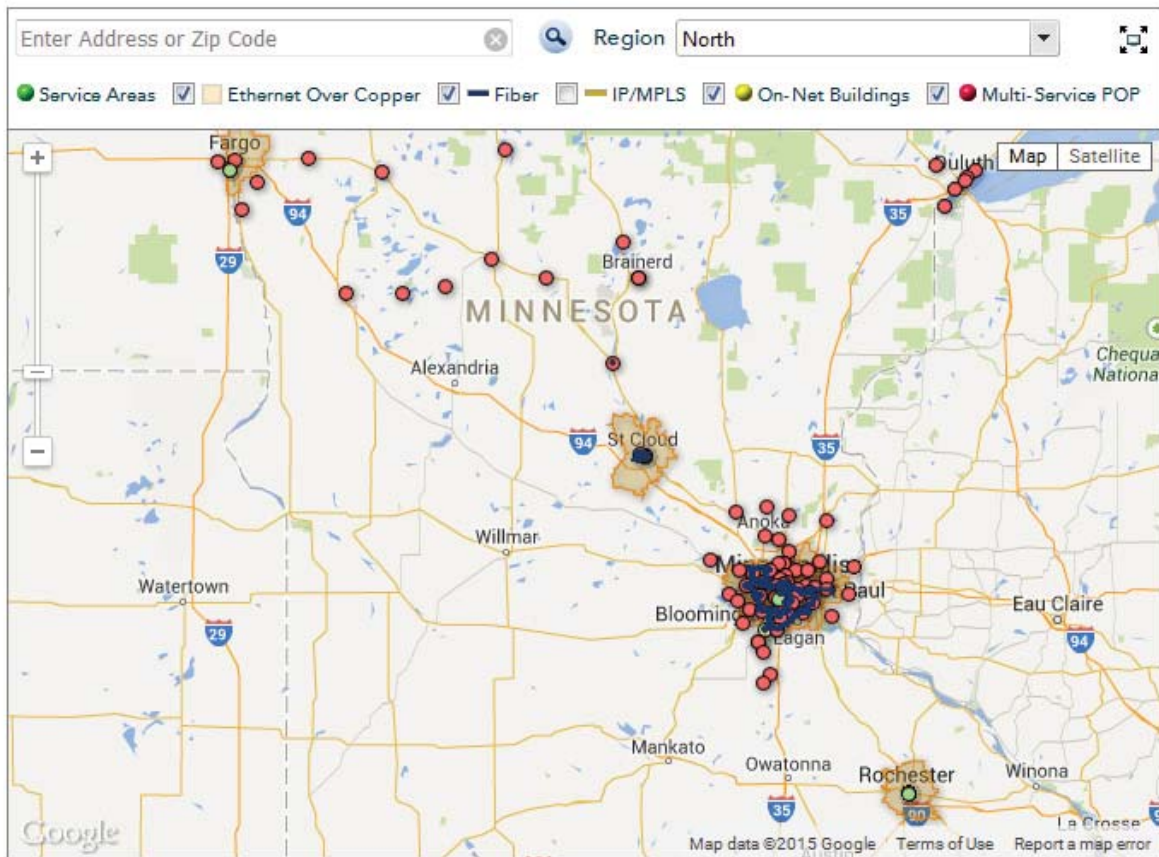
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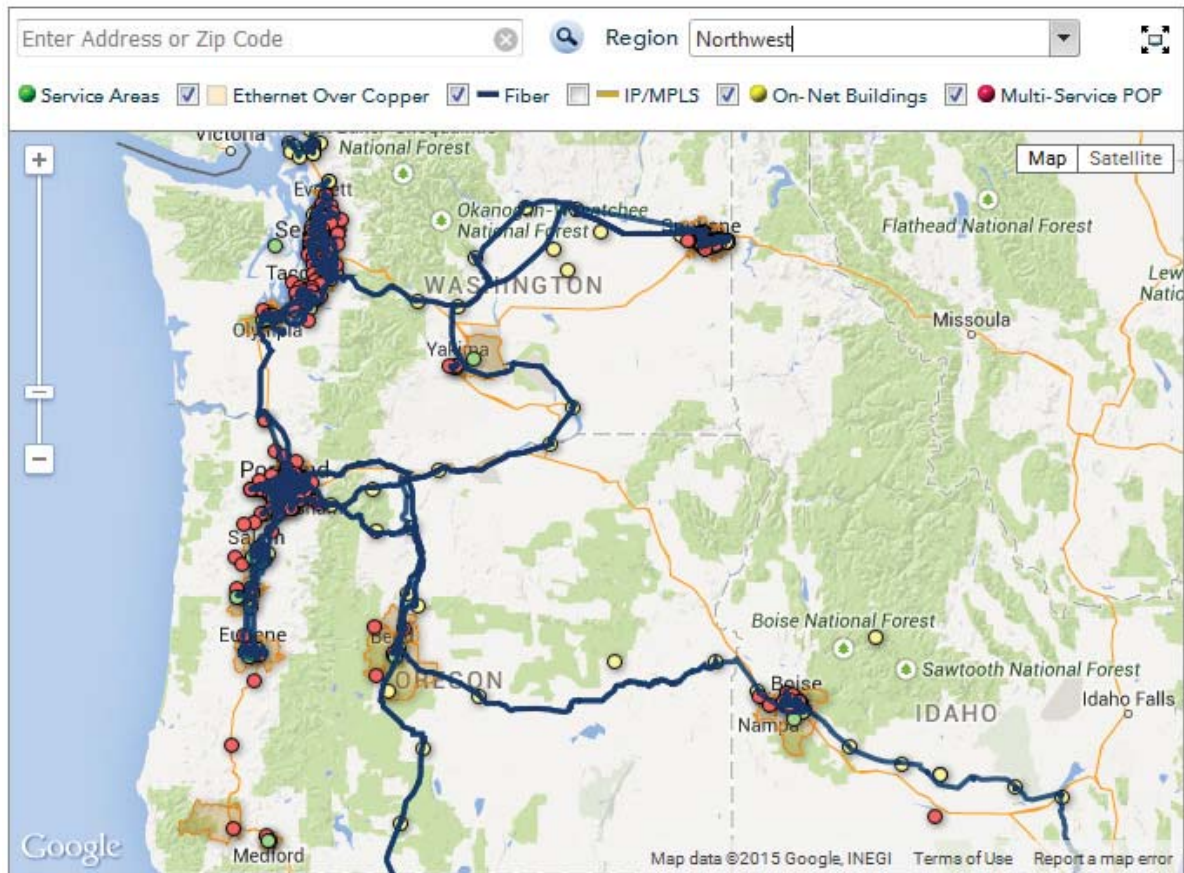
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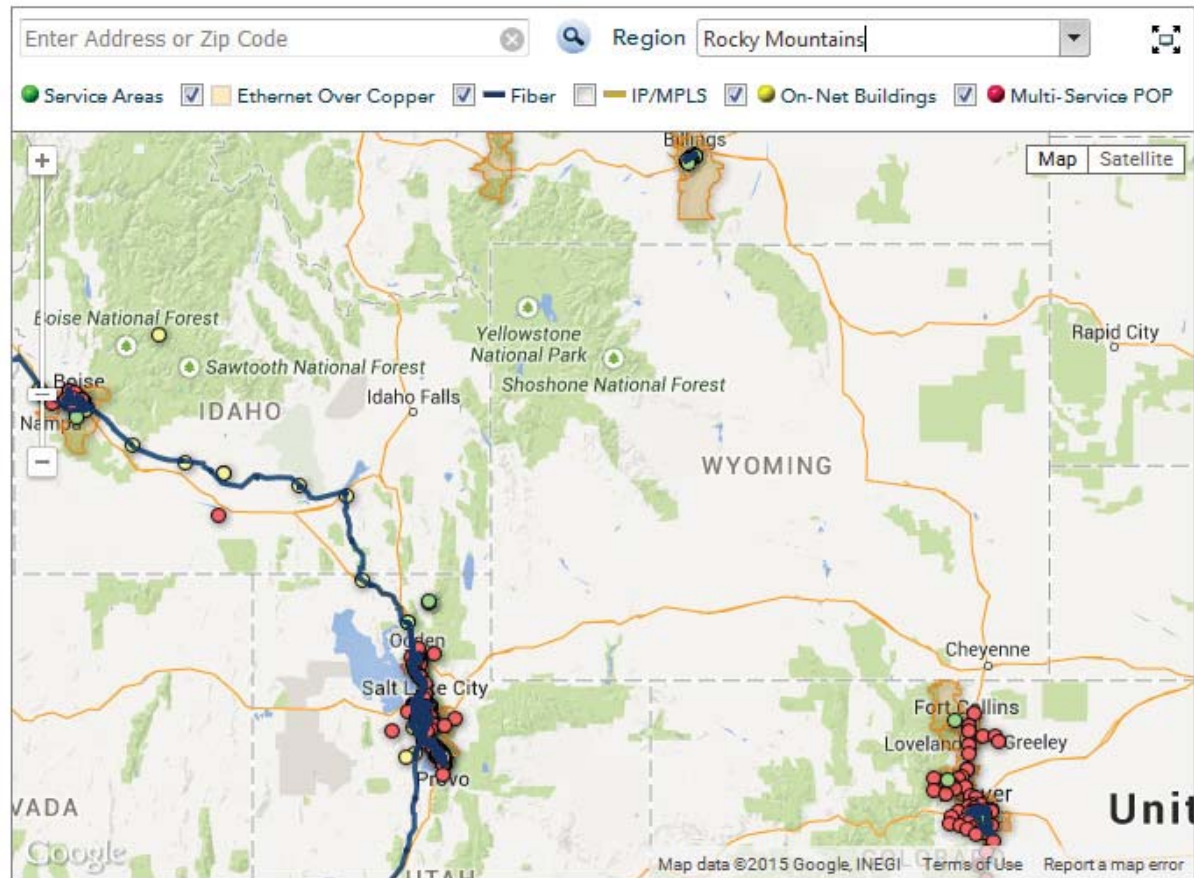
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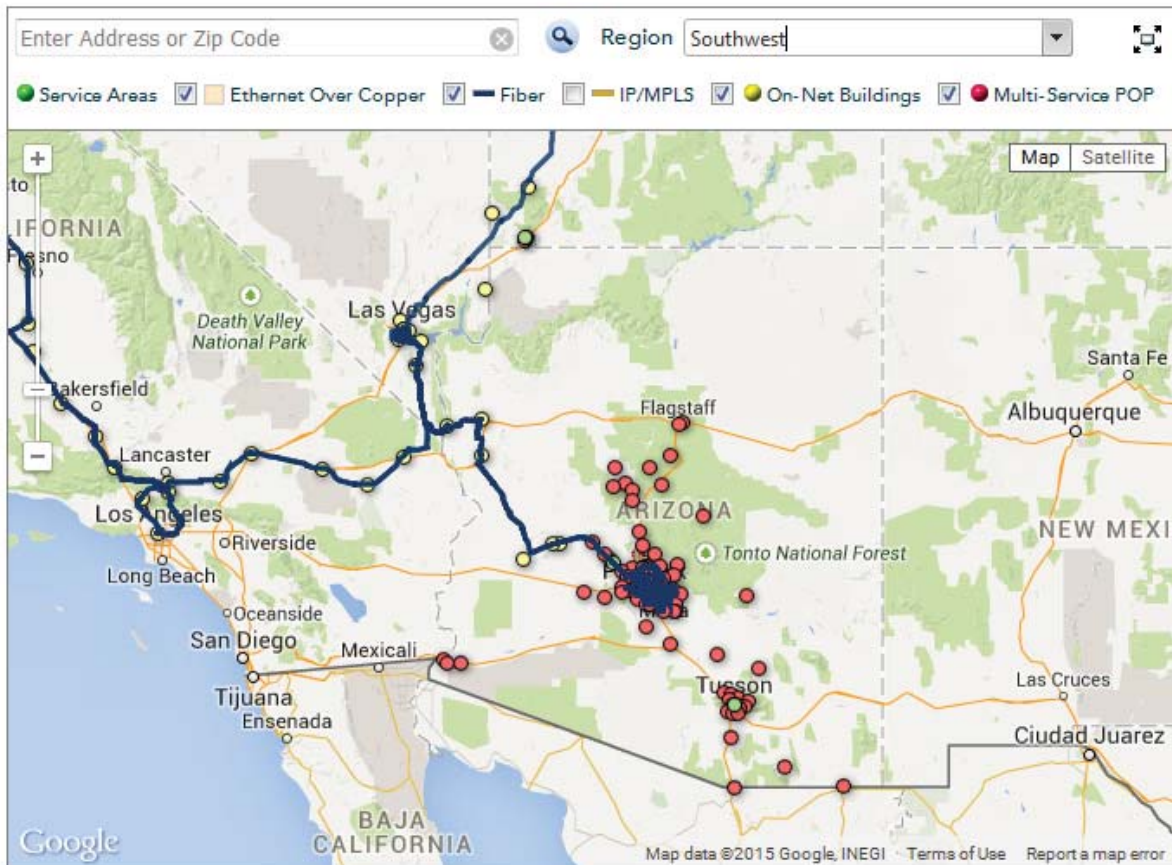
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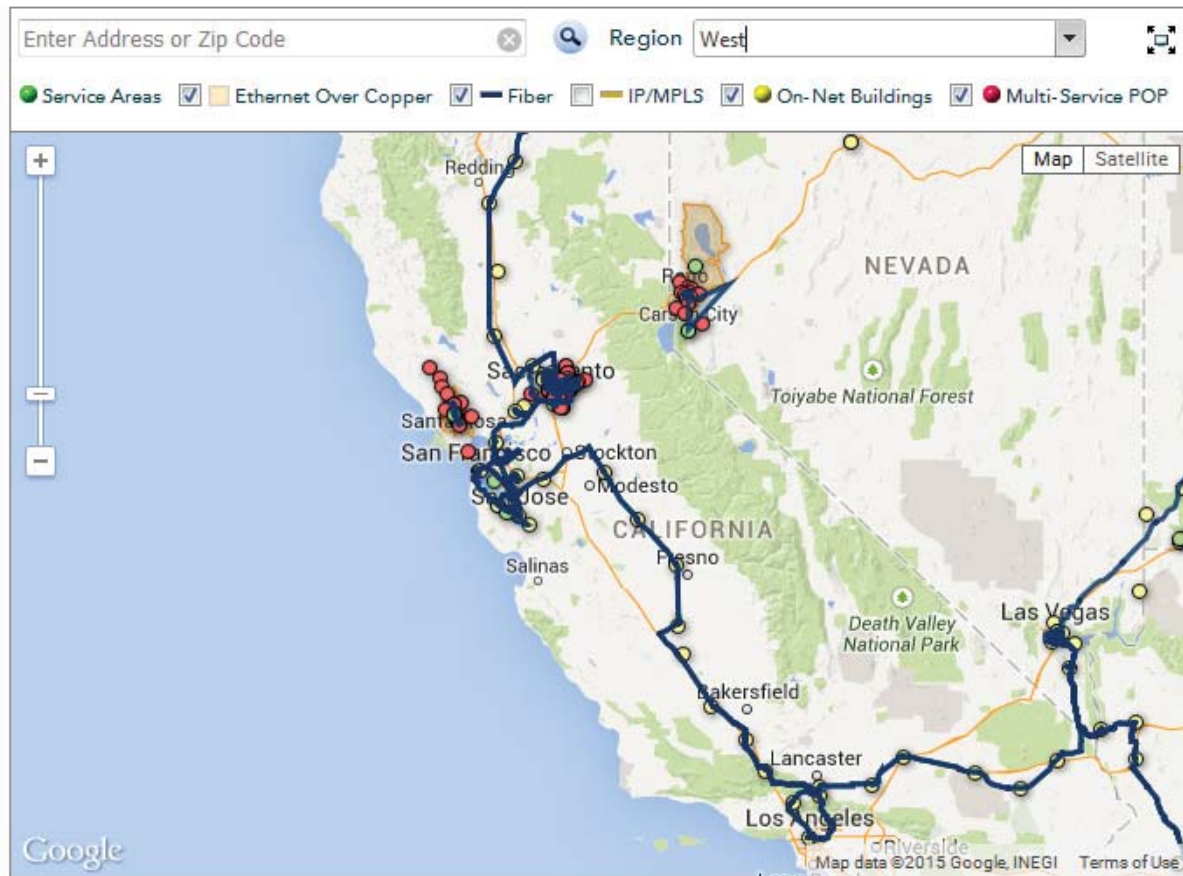
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Question II.A.18: How do your terms and conditions compare with ILEC offerings?

[Begin Confidential]

[End Confidential]

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Question II.A.19: Business Justification for Term and Volume Commitments

Response: **[Begin Confidential]**

[End Confidential]

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II.C.1. If you provide *Best Efforts Business Broadband Internet Access Services* to 15,000 or more customers or 1,500 or more business broadband customers in areas where the *ILEC* is subject to price cap regulation, then answer the following questions:

- a. Did you submit data in connection with the State Broadband Initiative (SBI) Grant Program for 2013?
- b. Did the data you submitted in connection with the SBI Grant Program in 2013 accurately and completely identify the areas in which you offered *Best Efforts Business Broadband Internet Access Services* and exclude those areas where you did not offer such services as of December 31, 2013?
- i. If yes, then provide the list of prices for those *Best Efforts Business Broadband Internet Access Services* that you were marketing in each census block submitted in connection with the SBI Grant Program as of December 31, 2013. If there is a price variation within your service footprint, indicate which prices are associated with which census blocks.

Response: **[Begin Confidential]**
[End Confidential]

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II.D.1. Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for *Dedicated Services*. In your description, please describe the size (*e.g.*, companies with 500 employees or less, etc.), geographic scope (*e.g.*, national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response: **[Begin Highly Confidential Information]**

[End Highly Confidential Information]

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Question II.D.2: Identify where your company's policies are recorded on the following *Dedicated Service*-related processes: (a) initiation of service; (b) service *Upgrades*; and (c) service *Disconnections*. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a *Tariff*, provide the specific *Tariff* section(s). If these policies are recorded in documents other than *Tariffs*, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response: **[Begin Confidential]**

[End Confidential]

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Question II.F.8: Terms and Conditions Constraints

Response: **[Begin Confidential]**

[End Confidential]

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II.F.9. (Optional) If you purchase, or purchased, *Transport Service* and *End User Channel Terminations* from the same *Provider*, explain your experience with changing *Transport Service* from one *Provider* to another between January 1 and December 31, 2013 while keeping your *End User Channel Terminations* with the original *Provider*. Where appropriate, identify the *Provider(s)* in your responses below and indicate whether they are an *ILEC* or a *Competitive Provider*.

- a. How many times did you change *Transport Service* while keeping your *End User Channel Terminations* with the original *Provider*? An estimate of the number of circuits moved to a new *Transport Provider*, or the number of such changes requested, is sufficient.
- b. What was the length of time, on average, it took for the original *Provider* to complete the process of connecting your last-mile *End-user Channel Terminations* to another *Transport Provider*? An estimate is sufficient.
- c. Were you given the opportunity to negotiate the amount of time it would take to complete the process of connecting your *End User Channel Terminations* to another *Transport Provider* on a case-by-case basis? In answering this question, also describe and provide citations to the *ILEC's* or *Competitive Provider's* policies, rules or, where relevant, *Tariff* provisions, if known, explaining the transition process.
- d. How did connecting to a new *Transport Provider* impact the rate you paid for the *End User Channel Terminations* you continued to purchase from the original *Provider*?
- e. Did connecting to a new *Transport Provider* typically impact the rate you continued to pay for *Transport Service* from the original *Provider* while the change in *Transport Providers* remained pending? If so, how? What was the average percentage change in rates? For example, did you ever pay a *One Month Term Only Rate* during that time?

Integra Response: [Begin Confidential] [End Confidential]

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II.F.10. (Optional) Describe any circumstances since January 1, 2013, in which you have purchased circuits pursuant to a *Tariff*, solely for the purpose of meeting a *Prior Purchase-Based Commitment* required for a discount or *Non-Rate Benefit* from your *Provider* (i.e., you would not have purchased the circuit but for the requirement that you meet a *Volume Commitment* required for a discount or *Non-Rate Benefit* from your *Provider*). In your description, provide at least one example, which at a minimum, lists:

- a. The name of the *Provider* providing the circuits at issue;
- b. A description of the *Prior Purchase-Based Commitment*;
- c. The *Tariff* and section number(s) of the specific terms and conditions described;
- d. The number of circuits you would not have purchased but for the *Prior Purchase-Based Commitment* requirement to receive a discount or *Non-Rate Benefit*;
 - i. Of the circuits reported in II.F.10.d, how many did you not use at all?
- e. A comparison of the dollar amount of the unnecessary circuit(s) purchased versus the dollar amount of penalties your company would have had to pay under the *Prior Purchase-Based Commitment* had it not purchased and/or maintained the circuit(s), and a description of how that comparison was calculated.
- f. How many circuits were activated under the identified *Tariff* plan and not used when you initially entered into the plan? What were these unused circuits as a percent of the total circuits currently purchased under this *Tariff* plan? Indicate the percent of the total circuits currently purchased under this *Tariff* plan that exceed your *Prior Purchase-Based Commitment*.
- g. For the *Prior Purchase-Based Commitment*, indicate whether you are able to buy any *DS1s* or *DS3s* from the *Provider* outside of the identified *Tariff* plan, or are you required to make all purchases from the *Provider* pursuant to the identified *Tariff* plan?

Response: **[Begin Confidential]** **[End Confidential]**

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II.F.11. For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing *End-User Channel Terminations* from one *Provider of Dedicated Services* to another.

Response: **[Begin Confidential]** **[End Confidential]**

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II.F.12. (Optional) Explain the circumstances since January 1, 2013 under which you have paid *One Month Term Only Rates* for *DS1*, *DS3*, and/or *PBDS* services and the impact, if any, it had on your business and your customers. In your response, indicate any general rules you follow, if any, concerning the maximum number of circuits and maximum amount of time you will pay *One Month Term Only Rates*, and your business rationale for any such rules.

Response: **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]**.

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